

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**ORDER GRANTING THE MOTION OF THE FTX RECOVERY TRUST
FOR ENTRY OF AN ORDER IMPLEMENTING CERTAIN
PROCEDURES FOR LATE-FILED CLAIMS**

Upon the motion (the “Motion”)² of the FTX Recovery Trust for entry of an order (this “Order”) implementing certain Disallowance Procedures for late-filed claims and granting related relief; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that no other or further notice is necessary; and upon the record before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

and its beneficiaries; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The FTX Recovery Trust shall have no obligation to review or respond to any proofs of claim or proofs of interest filed after the date hereof and such proofs of claim or proofs of interest shall be disallowed and expunged in their entirety without further order of the Court, unless: (x) the claim filer has obtained an order from the Court authorizing the filing of such claim after the applicable Bar Date or (y) the FTX Recovery Trust consents to the filing of such claim in writing. For the avoidance of doubt, this Order shall not affect any: (a) proofs of claim or proofs of interest that were filed prior to the date hereof (even if filed after the applicable Bar Date); or (b) in accordance with Section 8.4 of the Plan, proposed amendments to existing proofs of claim or proofs of interest filed after the date hereof; *provided* that the FTX Recovery Trust's rights to object to such amendments on any applicable grounds are preserved.
3. Subject to the exceptions described in the preceding paragraph, and notwithstanding anything to the contrary in the *Order Authorizing the Employment and Retention of Kroll Restructuring Administration LLC as Claims and Noticing Agent Effective Nunc Pro Tunc to the Petition Date* [D.I. 132], (A) Kroll Restructuring Administration LLC ("Kroll") is authorized to (i) cease processing proofs of claim filed after the date hereof and (ii) discontinue access to Kroll's Online Claim and Proof of Interest Filing Portals located at <https://restructuring.ra.kroll.com/FTX/EPOC-Index> and (B) Kroll and the Clerk of the Court are each authorized to destroy any paper proof of claim mailed to them after the date hereof without notice to the claimant.

4. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

5. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Order.

Dated: _____, 2025
Wilmington, Delaware

The Honorable Karen B. Owens
Chief United States Bankruptcy Judge